

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CRAIG D. ANDERSON

2432 Bayberry Ct

MAYS Landing NJ 08330

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

SEE ATTACHMENTS

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>CRAIG D. ANDERSON</u>
	Street Address	<u>2432 Bayberry Ct</u>
	County, City	<u>ATLANTIC County, MAYS Landing</u>
	State & Zip Code	<u>NJ 08330</u>
	Telephone Number	<u>609-665-2809</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name ZFC Legal title trust 1, US BANK NATIONAL
 Street Address 60 LIVINGSTON AVE EP-MN-W33D
 County, City St Paul
 State & Zip Code MA 55107

Defendant No. 2 Name ZAIS Financial CORP (A.K.A. ZFC Legal title trust 1)
 Street Address 2 BRIDGE AVE Suite 322
 County, City Red Bank
 State & Zip Code NY 55107

Defendant No. 3 Name FAY SERVICING LLC
 Street Address 939 W. NORTH AVE
 County, City CHICAGO
 State & Zip Code IL 60642

Defendant No. 4 Name WELLS FARGO BANK
 Street Address P.O. BOX 2026
 County, City FLINT
 State & Zip Code MI 48501

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions ☐ Diversity of Citizenship
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship UNITED STATES

Defendant(s) state(s) of citizenship UNITED STATES

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? ATLANTIC COUNTY Did Research
ON A FORECLOSER of MIVES AND Find out the Following FRAUDS.

B. What date and approximate time did the events giving rise to your claim(s) occur? _____

UNKNOWN ON DATES & time Right Now

What
happened
to you?

C. Facts: STRESSED, EXHAUSTION, WEIGHT LOSS, CONSTANT WORRING,
ANGER, ANXIETY, FEELING POWERLESS, difficulty sleeping, upset STOMACH,
NOT eating.

2) EMOTIONAL STRESS, HAVING NEGATIVE EMOTIONAL REACTION, ANGER,
IRRITABILITY, RECKLESSNESS, INSOMNIA, PAIN AND suffering

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. _____

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I WANT FOR THESE BANKS, LAW FIRMS, SO CALLED LENDERS
TO HAVE THERE LICENCE REMOVED OR TO ^{BE} FINED them FOR THE
FRAUDS THEY ARE DOING TO HOME OWNERS AND I WOULD LIKE
TO SUE FOR ALL THE STRESS THAT I GOING THROU.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 5 day of MARCH, 20 16.

Signature of Plaintiff CRAIG ANDERSON
Mailing Address 2432 Bayberry Ct
MAYS Landing NJ 08330
Telephone Number 609-665-2809
Fax Number (if you have one) _____
E-mail Address _____

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: Craig N Anderson

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Sunday, March 6, 2016

3:50 PM

introduction

1.) this action is brought to recover damages and penalties from conduct by the defendants in creating and using fraudulent mortgage assignments and mortgage assignment and mortgage note endorsements.

2.) through an extensive investigation, one which required particular skills, including handwriting analysis, the plaintiff in this case, Mr. Craig Anderson, discovered that mortgage documents were regularly being used in foreclosures across the county that among other defects were backdates, had falsely stated dates of transfer, had fraudulent notarizations, had forged signatures, were signed by employees of the servicers or document preparers who often falsely claimed to be officers of the originating bank and other entities up the chain of assignments, and were "ROBO-signed" (i.e. Signed in bulk).

3.) such fraudulent assignment and notes endorsements formed the basis for the submission of at least tens of thousands of false claims in the united states.

4.) when the trustee and custodian banks and servicers discovered that the mortgage assignments were missing, they, together with the default management and/or mortgage loan documentation companies, devised and operated a scheme to replace the missing assignments with fraudulent, fabricated assignments.

5.) these fraudulent documents usually assignments of the mortgage were then filed in the court and filed in the county record that the trust was the proper party to foreclose on the mortgage.

6.) plaintiff claims are brought pursuant to the federal false claims act, 31 U.S.C. 3729 et seg. And similar provisions in the state and municipal false claims act indicated herein.

7.) plaintiff seeks to recover damages and civil penalties arising from the false claims and false statements made by the defendants.

8.) the fraud carried out by the defendants in this case includes the following:

A.) mortgage assignments with forged signatures of the individuals signing on behalf of the grantors, and forged signatures of the witnesses and the notaries.

B.) mortgage assignments with signatures of individuals signing as corporate as corporate officers for bank and mortgage companies that never employed them.

C.) mortgage assignments with purported effective dates unrelated to the date of any actual or attempted transfer(and in the case of the trust, years after the closing date of the trusts).

D,) mortgage assignments prepared on behalf of grantors who had never themselves acquired ownership of the mortgage and note by a valid transfer, including numerous such assignments where the grantor was identified as "bogus" assignee for intervening assignments and mortgage assignments notarized by notaries who never witnessed the signatures that they notarized.

E.) the defendants may have used these fraudulent assignments and note endorsements because the original loan documents were never delivered to the MSB trusts; or because the original loan documents were defective or because the original loan documents were delivered but subsequently destroyed; or because the servicers used fraudulent document production as revenue source; or because of ineptitude regardless as any justification or excuse, a multitude of fraudulent documents were used in in foreclosure proceeding on the MSB trust assets and formed the basis for false claims on mortgages.

Jurisdiction and venue

A.) the court has jurisdiction over the subject matter of the action pursuant to 28 U.S.C.-1331 and 31 U.S.C. and 3732 and supplemental jurisdiction over the counts related to the state and municipal false claims act pursuant to 28 U.S.C.. and 1367.

Mr. Anderson who hired the two foreclosure special who discovered a forged mortgage assignment filed in his foreclosure by (ZFC Legal Title Trust 1 and US National Bank).

B.) affixing or submitting false signatures on a mortgage document is a violation of federal and state law, and those signatures are without authority to complete the transaction, according to a mortgage fraud notice prepared jointly by the federal bureau of investigation and the mortgage bankers association, mortgage fraud potentially violates at least 5 federal criminal statutes.

Specifically:

- 1. 18 U.S.C.-1028- fraud and related activity in connection with identification documents**

2. 18 U.S.C.-1341- fraud and swindles by mail
3. 18 U.S.C.-1342- fictitious name or address
4. 18 U.S.C.-1343- fraud by wire
5. 18 U.S.C.-1344- bank fraud

Because the signatures contained on the assignment files in Mr. Anderson foreclosure case were fraudulent, in violation of federal and state laws

Defendant paid law firms to create fraudulent documents

C.) Mr. Anderson further examined assignments prepared by Fein, Such, Kahn & Shepard, pc law firm who also has a 3/4 min video on (YOUTUBE) for doing fraudulent documents on mortgages are now being used by (ZFC legal title trust 1 and US National Bank in it 's default management processes

Exhibits are as follows:

- 1.) ex-a (defendant involved in the lawsuit)
- 2.) ex-b (securities and exchange commission)
- 3.) ex-c (mortgage)
- 4.) ex-d (note)
- 5.) ex-e (assignment of mortgage)
- 6.) ex-f (certification of the analyst of Thomas Hargreaves)
- 7.) ex-g (audit narrative and findings
- 8.) ex-h (summary and conclusion)
- 9.) ex-l (condominium rider)
- 10.) ex- j (fraudulent assignment of mortgage)

- 11.) ex- k (conflict of interest laws In new jersey)**
- 12.) ex-l (my 1st assignment of mortgage)**
- 13.) ex-m (fraudulent notice of intent to foreclose examined)**
- 14.) ex-n (mortgage timeline based upon the noi)**
- 15.) ex-0 (attorney certification of diligent)**
- 16.) ex-p (M.E.R.S. member rules)**
- 17.) ex-q (court rule 4:50-1)**